

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION

LUCRETIA MOONEY,

Plaintiff,

vs.

AMERICAN INTERNATIONAL GROUP, INC;
et al.,

Defendants.

*
*
*
* Civil Action No.:
* 3:06-cv-00055-WHA
*
*
*
*
*

NOTICE OF CORRECTION

COMES NOW, counsel for Plaintiff, and serves notice of a misstated fact referenced in her *Opposition to Defendants' Motion for Leave to Conduct Remand-Related Discovery* (Document # 16).

1. On page seven (7) of the above referenced motion, Plaintiff's counsel erroneously stated that Judge Fuller of the United States District Court for the Middle District of Alabama recently remanded two identical cases, citing Willie Lee Poole v. American International Group, Inc., et al., Civil Action No. 2:05cv774-MEF (M.D.Ala. February 9, 2006) and Joe T. Smith v. American International Group, Inc., et al., Civil Action No. 2:05cv1065-MEF (M.D.Ala. February 10, 2006). In fact, only the Joe T. Smith case has been remanded. The court has not ruled on the *Motion to Remand* in the Willie Lee Poole case, but had ruled on the issue of remand-related discovery. The Motion to Remand is still pending.

2. Plaintiff's counsel genuinely apologizes for this oversight and any confusion this may have caused.

Corrected this, the 2nd day of March, 2006.

/s/ Charles Lance Gould
C. LANCE GOULD (GOU007)
Attorney for Plaintiff

OF COUNSEL:

**BEASLEY, ALLEN, CROW,
METHVIN, PORTIS & MILES, P.C.**
Attorneys at Law
Post Office Box 4160
Montgomery, AL 36103-4160
(334) 269-2343
(334) 954-7555 (fax)

CERTIFICATE OF SERVICE

I hereby certify that on this the 2nd day of March, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

/s/ Charles Lance Gould
OF COUNSEL

Jeffrey M. Grantham
John Thomas Aquina Malatesta, III
Thomas Julian Butler
Maynard, Cooper & Gale, P.C.
1901 Sixth Avenue North
2400 AmSouth/Harbert Plaza
Birmingham, AL 35203-2618
205-254-1035
Fax: 205-254-1999

David Alan Elliott
Matthew Thomas Mitchell
Robert Howard Rutherford
Burr & Forman LLP
420 North Twentieth Street
Suite 3100
Birmingham, AL 35203
205-251-3000
Fax: 205-458-5631